

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS KEVIN RACHEL
(APWU/USPS-T8-1-2)
(January 27, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Kevin Rachel (USPS-T-8). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T8-1 As a result of excessing or the reassignment of employees because of programs like AMP studies, how many employees are now in a protected salary rate?

APWU/USPS-T8-2 When a mail processing facility closes and employees must be relocated, what is the average transfer benefit costs for the relocation?